

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

TIFFANY HILL, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

XEROX CORPORATION, a New York
Corporation, LIVEBRIDGE, INC., an Oregon
Corporation, AFFILIATED COMPUTER
SERVICES, INC., a Delaware Corporation,
AFFILIATED COMPUTER SERVICES, LLC,
a Delaware Limited Liability Company,

Defendants.

NO. 2:12-cv-00717-JCC

**STIPULATION ALLOWING
PLAINTIFF TO FILE SECOND
AMENDED CLASS ACTION
COMPLAINT PURSUANT TO RULE
15(a)(2)**

Plaintiff Tiffany Hill and Defendants Xerox Corporation, Livebridge, Inc., Affiliated
Computer Services, Inc. and Affiliated Computer Services, LLC, by and through their
undersigned counsel, hereby stipulate that Plaintiff may file the Second Amended Class Action
Complaint (to be filed this day) without leave of Court, pursuant to Fed. R. Civ. P. 15(a)(2).
The parties further agree that Defendants' stipulation hereto is not an acknowledgement,
agreement, or admission that any aspect of the Second Amended Class Action Complaint is
warranted or has merit.

STIPULATION ALLOWING PLAINTIFF TO FILE
SECOND AMENDED CLASS ACTION
COMPLAINT PURSUANT TO RULE 15(a)(2) - 1
CASE No. 2:12-cv-00717-JCC

TERRELL MARSHALL DAUDT & WILLIE PLLC
936 North 34th Street, Suite 400
Seattle, Washington 98103-8869
TEL. 206.816.6603 • FAX 206.350.3528
www.tmdlaw.com

RESPECTFULLY SUBMITTED AND DATED this 22nd day of January, 2013.

TERRELL MARSHALL DAUDT
& WILLIE PLLC

K&L GATES LLP

By: /s/ Toby J. Marshall, WSBA #32726

Toby J. Marshall, WSBA #32726
Email: tmarshall@tmdwlaw.com
Marc C. Cote, WSBA #39824
Email: mcote@tmdwlaw.com
936 North 34th Street, Suite 400
Seattle, Washington 98103
Telephone: (206) 816-6603
Facsimile: (206) 350-3528

By: /s/ Patrick M. Madden, WSBA #21356

Patrick M. Madden, WSBA #21356
Email: patrick.madden@klgates.com
Ryan D. Redekopp, WSBA #36853
Email: ryan.redekopp@klgates.com
925 Fourth Avenue, Suite 2900
Seattle, Washington 98104-1158
Telephone: (206) 623-7580
Facsimile: (206) 623-7022

Jon W. MacLeod, WSBA #8491
Email: jwm@jwmacleodlaw.com
MacLEOD LLC
1700 Seventh Avenue, Suite 2100
Seattle, Washington 98101
Telephone: (206) 357-8470
Facsimile: (206) 357-8401

Attorneys for Defendants

Daniel F. Johnson, WSBA #27848
Email: djohnson@bjtlegal.com
BRESKIN JOHNSON &
TOWNSEND, PLLC
1111 Third Avenue, Suite 2230
Seattle, Washington 98101
Telephone: (206) 652-8660
Facsimile: (206) 652-8290

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Toby J. Marshall, hereby certify that on January 22, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Patrick M. Madden, WSBA #21356
Email: patrick.madden@klgates.com
Ryan D. Redekopp, WSBA #36853
Email: ryan.redekopp@klgates.com
K&L GATES LLP
925 Fourth Avenue, Suite 2900
Seattle, Washington 98104-1158
Telephone: (206) 623-7580
Facsimile: (206) 623-7022

Attorneys for Defendants

DATED this 22nd day of January, 2013.

TERRELL MARSHALL DAUDT & WILLIE PLLC

By: /s/ Toby J. Marshall, WSBA #32726
Toby J. Marshall, WSBA #32726
Email: tmarshall@tmdwlaw.com
Marc C. Cote, WSBA #39824
Email: mcote@tmdwlaw.com
936 North 34th Street, Suite 400
Seattle, Washington 98103
Telephone: (206) 816-6603
Facsimile: (206) 350-3528

Attorneys for Plaintiff